

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF OKLAHOMA**

LAWRENCE A. LOCKE, individually and on
behalf of all others similarly situated,

Plaintiff,

v.

Case No. 5:10-cv-01277-F

QUIBIDS, LLC,

Defendant.

UNOPPOSED MOTION FOR ENLARGEMENT OF TIME

Pursuant to LCvR 7.1(h), Defendant QuiBids, LLC (“QuiBids”) respectfully moves the Court for an enlargement of time to file its reply brief in support of its motion to dismiss, its reply brief in support of its motion to strike and its response to Plaintiff’s motion for leave to file a Second Amended Complaint. In support of its request to extend the deadline for all three briefs to April 22, 2011, QuiBids states as follows:

1. QuiBids moved to dismiss the First Amended Complaint on February 5, 2011 [docket entry #20] and moved to strike portions of the First Amended Complaint on February 8, 2011 [docket entry #21].
2. After receiving two extensions from the Court [docket entry ##23, 25], Plaintiff responded to both motions on March 25, 2011 [docket entry ##29, 30]. On that same day, Plaintiff also filed a Motion for Leave to File a Second Amended Complaint [docket entry #31].
3. Pursuant to LCvR 7.1(i), QuiBids’ reply briefs in support of its Motion to Dismiss and its Motion to Strike would be due on April 1, 2011, without the requested

extension. Pursuant to LCvR 7.1(g), its response to the Motion for Leave would be due on April 15, 2011, without the requested extension. QuiBids respectfully requests an extension of time to file all three referenced briefs on April 22, 2011.

4. QuiBids seeks additional time to file the three briefs for a number of reasons, including: having all three briefs due on the same day promotes efficiency, as the arguments are intertwined to a certain extent; plaintiff's response briefs raise new arguments that require additional time for a full reply; counsel for QuiBids has significant other deadlines around which it is trying to work.
5. QuiBids has not previously sought additional time to file the three briefs at issue in this Motion.
6. Plaintiff's counsel has agreed to the requested extension of time.
7. A proposed Order is attached.
8. Allowing QuiBids to file (1) a Reply in Support of its Motion to Dismiss the First Amended Complaint, (2) a Reply in Support of its Motion to Strike Certain Material from the First Amended Complaint and (3) a Response in Opposition to Plaintiff's Motion for Leave to File a Second Amended Complaint on April 22, 2011, will not unfairly prejudice any party to this litigation nor cause the extension of any date scheduled in this matter.

WHEREFORE, Defendant QuiBids, LLC respectfully requests that it be granted until April 22, 2011, to file the three briefs referenced in this unopposed motion, and requests any further relief to which the Court finds it justly entitled.

Respectfully submitted,

/s/ Michael D. McClintock
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ATTORNEYS FOR QUIBIDS, LLC

CERTIFICATE OF SERVICE

I hereby certify that on March 31, 2011, I electronically transmitted the attached document to the Clerk of Court using the ECF System for filing and transmittal of a Notice of Electronic Filing to the following registrants:

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